

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CIMC RAFFLES OFFSHORE (SINGAPORE) PTE.
LTD. AND YANTAI CIMC RAFFLES
OFFSHORE LIMITED,

Petitioners,

v.

SCHAHIN HOLDING S.A., SCHAHIN
ENGENHARIA S.A., SEA BISCUIT
INTERNATIONAL INC., BLACK GOLD
DRILLING LLC, BAERFIELD DRILLING LLC
and SORATU DRILLING LLC,

13 Civ. 0052 (JSR)

Respondents.

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DECLARATION OF PAUL S. HESSLER

Pursuant 28 U.S.C. § 1746, I, Paul S. Hessler, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

1. I am a Partner with the law firm Linklaters LLP, counsel to Respondents Schahin Engenharia S.A., Black Gold Drilling LLC, Baerfield Drilling LLC and Soratu Drilling LLC (together, "Respondents") in this proceeding.
2. I respectfully submit this declaration in connection with the Respondents' opposition to CIMC Raffles' Motion To Hold Respondents (Other Than Sea Biscuit International Inc.) In Contempt Of Court and in Support of the Judgment Debtors' Motion To Stay Enforcement.
3. Attached hereto as Exhibit 1 is a true and correct copy of the Respondents' correspondence sent to Petitioners on April 19, 2013.

4. Attached hereto as Exhibit 2 is a true and correct copy of Petitioners' response to the Respondents' correspondence dated April 19, 2013.

5. Attached hereto as Exhibit 3 is a true and correct copy of the Respondents' correspondence sent to Petitioners on April 23, 2013.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Respondents' correspondence sent to Petitioners on June 5, 2013.

7. Attached hereto as Exhibit 5 is a true and correct copy of the Respondents' correspondence sent to Petitioners on June 7, 2013.

8. Attached hereto as Exhibit 6 is a true and correct copy of Petitioners' response to the Respondents' correspondence dated June 7, 2013.

9. Attached hereto as Exhibit 7 is a true and correct copy of the Respondents' correspondence sent to Petitioners on June 12, 2013.

10. Attached hereto as Exhibit 8 is a true and correct copy of Petitioners' response to the Respondents' correspondence dated June 12, 2013.

11. Attached hereto as Exhibit 9 is a true and correct copy of the Respondents' correspondence sent to Petitioners on July 18, 2013.

12. Attached hereto as Exhibit 10 is a true and correct copy of the Respondents' correspondence sent to Petitioners on August 18, 2013.

13. Attached hereto as Exhibit 11 is a true and correct copy of the Respondents' correspondence sent to Petitioners on August 19, 2013.

14. Attached hereto as Exhibit 12 is a true and correct copy of a certified translation of "Standard indexes of economic and financial indicators for companies with open capital in the civil construction industry that are members of the Novo Mercado [New Market]."

15. Attached hereto as Exhibit 13 is a true and correct copy of the Declaration of Fernando Schahin.

16. Attached hereto as Exhibit 14 is a true and correct copy of the Declaration of José Isaias Hoffmann.

Dated: New York, New York
September 3, 2013

Signed at New York, New York under penalty of perjury under the laws of the United States of America,

By: 
Paul S. Hessler